



1129 Northern Boulevard, Suite 404, Manhasset, NY 11030  Glevy@glpcfirm.com  (347) 941-4715

March 12, 2024

Hon. Jessica G. L. Clarke
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: **KARIM v. IMMUNESCHEIN, LLC**
DOCKET NO. 1:23-cv-10689

Dear Judge Clarke:

The undersigned represents Jessica Karim, the plaintiff in the above-referenced matter. I write to request an extension of time to decide how to respond to defendant's motion to dismiss, and for an adjournment of the initial pretrial conference currently scheduled for March 21, 2024. This is plaintiff's first request for the relief requested herein.

On March 6, 2024, defendant Immuneschein, LLC filed a motion to dismiss plaintiff's complaint. Pursuant to Rule 4(e) of Your Honor's Individual Rules and Practices in Civil Cases, the plaintiff, as the non-moving party, has 10 days from receipt of the motion to inform the Court and the adversary of their intention to file an amended pleading or to rely on the existing pleading.

We are currently evaluating the existing pleading and request an additional 15 days to make a determination on how to proceed. The necessity for this extension arises from an ongoing audit conducted by a potential expert witness recently retained by our office. The expert's analysis will assist in assessing the viability of plaintiff's claim and will guide our course of action. We anticipate receiving the expert's report within the next 10 days.

Plaintiff further requests an adjournment of the initial pretrial conference currently set for March 21st for a minimum of 30 days to allow sufficient time for plaintiff to determine the

appropriate course of action regarding the pending motion to dismiss. The defendants have consented to this request.

Alternatively, should Your Honor determine that the conference should proceed as scheduled, the parties jointly request that the conference be conducted via telephone for efficiency and convenience.

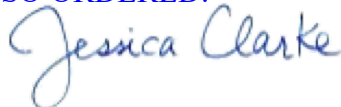
Thank you for your time and consideration on this matter.

Respectfully,

/s/ Gabriel A. Levy

Application GRANTED. Plaintiff to file a letter stating whether they will file an amended pleading or rely on the existing pleading by **April 1, 2024**. If Plaintiff chooses to rely on the existing pleading, Plaintiff shall file their opposition to the motion to dismiss by **April 5, 2024** and Defendant shall file their reply in support of the motion to dismiss by **April 19, 2024**. The initial pretrial conference in this matter, previously scheduled for March 21, 2024 at 2:00 p.m. is RESCHEDULED for **April 25, 2024 at 2:00 p.m.** The joint letter and proposed Civil Case Management Plan and Scheduling Order, as described in ECF No. 12, shall be filed by **April 18, 2024**. The Clerk of Court is directed to terminate ECF No. 17.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: March 12, 2024
New York, New York